

Victor J. Mastromarco, Jr. (Mich Bar No P34564) Hearing Date: May 12, 2006
MASTROMARCO & JAHN, P.C. Time: 10:00 a.m.
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

Debtors.

**SUPPLEMENT TO CINDY PALMER PERSONAL REPRESENTATIVE
OF THE ESTATE OF MICHAEL PALMER MOTION FOR RELIEF
FROM THE AUTOMATIC STAY UNDER SECTION 362 OF THE
BANKRUPTCY CODE**

Now comes the Movant, Cindy Palmer, as Personal Representative of the Estate of Michael Palmer, by and through her attorneys, who hereby files this supplement to her Motion For Relief from Automatic Stay under Section 362 of the Bankruptcy Code for the reasons as set forth more fully below:

1.

That the Creditor hereby clarifies the relief requested in her Motion and hereby affirmatively state that she is only seeking in her motion a conditional lifting of the stay for the sole and limited purpose of prosecuting (and possibly

mediating) her previously filed claims against the Debtor in the case of Cindy L. Palmer vs. Delphi Automotive Systems USA, LLC (Michigan Court of Appeals Case Number 262873).

2.

That the Creditor hereby agrees not to enforce any decision and/or settlement without this Court's approval, and the Creditor is not seeking to have this Court lift the stay (at this time) to enforce any decision and/or settlement which may ultimately be reached in the Michigan Courts including the Appellate Courts.

3.

That the relief requested by the Movant is consistent with the relief requested by other creditors upon which the stay has been lifted by this Court. (See **Exhibit 1**).

WHEREFORE, the Movant respectfully request that the Court enter an order modifying the automatic stay to allow the action to proceed to either a final judgment or a settlement. At this time the Movant is not seeking that the stay be lifted for enforcing a settlement and/or judgment.

Dated: April 18, 2006

Respectfully submitted,

MASTROMARCO & JAHN, P.C.

s/ Victor J. Mastromarco, Jr.
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